



Montana Fish, Wildlife & Parks

1400 South 19th Avenue
Bozeman, MT 59718

April 7, 2014

To: Governor's Office, Tim Baker, State Capitol, Room 204, P.O. Box 200801, Helena, MT 59620-0801
Environmental Quality Council, State Capitol, Room 106, P.O. Box 201704, Helena, MT 59620-1704
Dept. of Environmental Quality, Metcalf Building, P.O. Box 200901, Helena, MT 59620-0901
Dept. of Natural Resources & Conservation, P.O. Box 201601, Helena, MT 59620-1601
Montana Fish, Wildlife & Parks:

Director's Office	Parks Division	Lands Section	FWP
Commissioners	Fisheries Division	Legal Unit	Wildlife Division
Design & Construction			

MT Historical Society, State Historic Preservation Office, P.O. Box 201202, Helena, MT 59620-1202
MT State Parks Association, P.O. Box 699, Billings, MT 59103
MT State Library, 1515 E. Sixth Ave., P.O. Box 201800, Helena, MT 59620
James Jensen, Montana Environmental Information Center, P.O. Box 1184, Helena, MT 59624
Janet Ellis, Montana Audubon Council, P.O. Box 595, Helena, MT 59624
George Ochenski, P.O. Box 689, Helena, MT 59624
Jerry DiMarco, P.O. Box 1571, Bozeman, MT 59771
Montana Wildlife Federation, P.O. Box 1175, Helena, MT 59624
Wayne Hurst, P.O. Box 728, Libby, MT 59923
Jack Jones, 3014 Irene St., Butte, MT 59701
Beaverhead Conservation District, 420 Barrett Street, Dillon, MT 59725
U.S. Army Corp of Engineers, 10 West 15th Street, Suite 2200, Helena, MT 59626-9705
U.S. Fish and Wildlife Service, 585 Shepard Way, Suite 1, Helena, MT 59601-6287
U.S. Fish and Wildlife Service, 420 Barrett Street, Dillon, MT 59725
Big Hole Watershed Committee, P.O. Box 931, Butte, MT 59703
Montana Trout Unlimited, P.O. Box 7186, Missoula, MT 59807
Dick Hirschy Cattle Company, Box 206, Wisdom, MT 59761
Dan Vermillion, FWP Commissioner, PO Box 668, Livingston, MT 59047
Anaconda Sportsmen Club, #2 Cherry, Anaconda MT 59711
Skyline Sportsmen, Box 173, Butte, MT 59701
Dept. of Natural Resources and Conservation, 730 N. Montana Street, Dillon, MT 59725-9424
The Madison River Foundation, P.O. Box 1527 Ennis, Montana 59729
Madison/Gallatin TU Mark Peterson, PO Box 52 Bozeman, MT 59771
Joe Gutkoski, Montana River Action, 304 N 18th Avenue Bozeman, MT 59715
Headwaters Fish & Game Association, PO Box 1941 Bozeman MT 59771-1941
Jeff Laszlo, Granger Ranches, PO Box 691, Ennis, MT 59729
Longhorn Ranch, PO Box 278, Ennis, MT 59729
Charles Wellington, 140 Linden Farms Road, Locust Valley, NY 11560
Jim Wellington, 18 Wellington Rd., Locust Valley, NY 11560
David Smith, 56 Jeffers Road, Ennis, MT 59729
John and Toni Scully, PO Box 986, Ennis, MT 59729
Larry and Shirley Love, PO Box 1018, Ennis, MT 59729
Lois and Volker Saier, PO Box 707, Ennis, MT 59712
Mary Saunders, PO Box 73, Ennis, MT 59712
Reints Ranch, 101 Jeffers Road, Ennis, MT 59729
Springhill Montana, 17 Card Sound Road, Key Largo, FL 33037-3771
L&G Living Trust, PO Box 7755, Olympia, WA 98507-7755

The Nature Conservancy, 32 South Ewing, Helena, MT 59601-5749
Buttermilk LLC, 168 Dan Road, Manhattan, MT 59741-8655
Patrick and Virginia Povah, PO Box 924, West Yellowstone, MT 59758-0924
Madison Fork Ranch, 8238 S. Sicily Ct, Aurora, CO 80016-7196
Sharon Townsend, 783 Lawrence Road, Pownal, ME 04069-6117

Ladies and Gentlemen,

The enclosed decision notice has been prepared for the proposed Southwest Montana Arctic Grayling Reintroduction Project. FWP is proposing to reintroduce Arctic grayling into several waters throughout southwestern Montana over a period of 10 years.

Comments to the Draft Environmental Assessment were received from five parties during the 38-day public comment period.

It is my decision to proceed with the proposed project with no changes to the Draft Environmental Assessment.

Questions regarding this Decision Notice should be directed to:

Pat Clancey
Fisheries Biologist
Box 1336
Ennis, MT 59729

Or emailed to : pclancey@mt.gov

Thank you for your interest.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. J. Flowers', with a large, stylized flourish at the end.

Patrick J. Flowers
Region Three Supervisor

ENVIRONMENTAL ASSESSMENT DECISION NOTICE

SOUTHWEST MONTANA ARCTIC GRAYLING REINTRODUCTIONS

**Montana Fish, Wildlife & Parks
Region Three, Bozeman
April 7, 2014**

Proposed Actions

Montana Fish, Wildlife & Parks (FWP) has proposed to reintroduce Arctic grayling into several waters of the Madison Drainage and into Wise River, Twin Lakes, Van Houten Lake and Trail Creek in the Big Hole Basin over a period of 10 years. The proposal states that remote site incubators (RSIs) would be used at most locations, though Arctic grayling fry may be used in the proposed lakes. Eggs for the RSIs would be collected from wild Arctic grayling or from FWP's wild Arctic grayling broodstock.

Montana Environmental Policy Act

Montana Fish, Wildlife & Parks is required by the Montana Environmental Policy Act (MEPA) to assess significant potential impacts of a proposed action to the human and physical environment. In compliance with MEPA, a draft Environmental Assessment (EA) was prepared by FWP for the proposed project and released on January 28, 2014 for a 38-day public comment period, ending March 7. A public meeting was held in Ennis, MT on February 11.

The draft EA was circulated to a standard FWP R-3 contact list, and to local landowners, sporting groups, governments, and federal agencies. The EA was also posted and remains available for viewing on the FWP webpage: <http://fwp.mt.gov/news/publicNotices>. A legal notice indicating release of the EA was sent to the Bozeman Daily Chronicle, the Montana Standard (Butte), the Dillon Tribune and the Madisonian (Ennis).

Summary of Public Comment and FWP Response

Written comments (all email) were received from five parties and verbal comment from two parties during the public comment period. Comments were received from the Greater Yellowstone Coalition, Montana Trout Unlimited, and five individuals. Five parties supported the action as proposed, one individual opposed the action, and one individual supported some parts of the action but opposed other parts.

Issues and concerns identified in the comments were:

1. Concern that the U.S. Fish & Wildlife Service (USFWS) will require suppression or removal of rainbow and brown trout from the Madison River between Hebgen and Ennis dams. One of these commenters, while concerned for non-native trout suppression in the Madison, also provided suggestions for methods to suppress non-native trout in the Big Hole Drainage to enhance that existing Arctic grayling population. This commenter

further suggested that any resources directed to reintroductions in the Madison Drainage would be better spent in the Big Hole Drainage.

2. Conduct habitat improvement projects to enhance grayling spawning sites, trap and selectively pass Arctic grayling while excluding non-native trout where possible.
3. Concern for a perception that new introductions leading to possible restrictions could be a disincentive to landowners, water users and anglers supporting future reintroductions.
4. The proposal is justified based on the status of Arctic grayling as a Montana Species of Special Concern, and by the repeated efforts to list it under the Endangered Species Act.
5. Acknowledgement of the opportunity to examine the potential threats to Arctic grayling from competition, predation and other factors presented by coexistence with non-native fish species, thereby adding to the scientific knowledge base from which long term grayling conservation management can benefit.

Response to comments:

1. FWP recognizes the concern for suppression of non-native trout. FWP is not aware of any situations where the USFWS has mandated suppression of non-native animals to support the conservation of natives. FWP stated in the draft EA that suppression of non-native trout or manipulation of populations will not be conducted as part of this reintroduction effort. A remnant Arctic grayling population persists in the Madison Drainage, primarily in Ennis Reservoir. If the Arctic grayling does get listed as a Threatened or Endangered Species, the designation will be applied to all Montana grayling in their historic range, including the existing Madison population, regardless of this proposal. Further, FWP holds statutory authority to manage fish and wildlife in Montana (MCA 87-1-201), and will not abdicate those responsibilities due to a listing. An example is bull trout, which are native to Montana west of the Continental Divide. Resident and migratory bull trout populations have been listed as a Threatened Species since 1999. Bull trout reside in waters on lands owned and managed by federal, state and private entities, yet the State of Montana retains full management authority of non-native fish species in those waters. Further, there have been no angling restrictions implemented on non-native species in bull trout occupied waters. FWP has had an active Arctic grayling conservation and restoration program in the Big Hole Drainage since 1992. Through the cooperative efforts of private landowners, FWP and federal agencies, tremendous improvements have been made in land, water and grazing management that have vastly improved habitat for Arctic grayling and assisted private landowners with their operations.
2. In considering potential reintroductions sites, FWP will strongly consider habitat condition and will select sites with high quality habitats for this effort. No habitat management actions are currently planned in association with this effort. Again, FWP stated in the draft EA that suppression of non-native trout or manipulation of populations will not be conducted as part of this reintroduction effort. As described in the EA, Arctic grayling introductions into the upper Ruby River were successful without suppression of the non-native trout population. Also, Yellowstone National Park is conducting a non-native removal from Grayling Creek within the Park to be followed by introduction of Arctic grayling and westslope cutthroat trout. That project will allow for a comparison of success between Arctic grayling reintroduction locations with and without non-native trout.

3. Regardless of this proposal, if the Arctic grayling does get listed as a Threatened or Endangered Species, the designation will be applied to all Montana grayling in their historic range, including the existing Madison population. The main purpose of the Endangered Species Act is to regulate federal actions or decisions that could harm protected species, and to prevent take. To FWP's knowledge, no such restrictions have occurred to Montana private landowners or anglers where bull trout exist and are listed under ESA.
4. FWP agrees that this action is warranted by the status of the grayling in its historical Montana range. This is a low-cost effort using a method that has been used successfully to establish Arctic grayling in portions of their historical range where non-native trout exist.
5. FWP recognizes this opportunity, especially in light of the on-going effort by Yellowstone National Park as described above.

Final Environmental Assessment for the EA titled: Southwest Montana Arctic Grayling Reintroductions.

There are no modifications necessary to the Draft Environmental Assessment based on public comment. The Draft Environmental Assessment, together with this Decision Notice, will serve as the final documents for these proposals.

Decision

Based on the Environmental Assessment, public comment, and the need to conserve Arctic grayling in the Missouri River drainage of SW Montana, FWP will proceed with the proposed Arctic grayling reintroductions.

I find there to be no significant impacts on the human and physical environments associated with this project. Therefore, I conclude that the Environmental Assessment is the appropriate level of analysis, and that an Environmental Impact Statement is not required.



Patrick J. Flowers
Region Three Supervisor
